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June 30, 2023

VIA ECF

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

Re: *Abrams, et al. v. New York City Dep't of Educ., et al.*, 22-cv-2546 (KPF)(VF)

Dear Judge Failla:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendants in the above-referenced action wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request that the filing deadline of the parties' joint status letter, currently due July 5, 2023, be extended to July 19, 2023. Plaintiff consents to this request. This is the first request for an extension of the joint status letter filing deadline. Defendant has completed its request for settlement authority, and expects to be able to make an initial offer to Plaintiff shortly. The parties are confident that they will be able to settle this matter without further burden on the Court's time, just as the parties were able to do recently in *Mendez v. Banks*

et al., 22-cv-10405 (GHW) (ECF No. 23) and *Carillo et al. v. Porter et al.*, 21-cv-8357 (JGK) (ECF No. 38), for example.

Thank you for considering this request.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Rory Bellantoni, Esq. (via ECF)

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket entry 37.

Dated: July 5, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE